9.

#### DIVISION OF SOCIAL SERVICES

Subrecipient Self-Assessment of Internal Controls and Risks

Subrecipient Name CUMBERLAND County Department of Social Services Date Prepared 09/30/2008

Answer "Yes" if activity in question is performed by another county agency, i.e., County Finance office or the County Manager's office. Each "No" answer indicates a potential weakness of internal fiscal controls. All "No" answers require an explanation of mitigating controls or a note of planned changes.

	OL ENVIRONMENT ment's Philosophy and Operating Style
	1. Are periodic (monthly, quarterly) reports on the status of actual to budgeted performance prepared and reviewed by top management?
	2. Are unusual variances between budgeted revenues and expenditures and actual expenditures and revenues examined?
	3. Is the internal control structure supervised and reviewed by management to determine if it is operating as intended?
B. Orga	nizational Structure
$\boxtimes \Box \Box$	4. Is there a current organizational chart defining the lines of responsibility?
	5. Has all management staff been sufficiently trained to perform their assigned duties
C. Assignm	ent of Authority and Responsibility
	6. Are sufficient training opportunities to improve competency and update employees on Program, Fiscal and Personnel policies and procedures available?
	7. Have managers been provided with clear goals and direction from the governing body or top management?
	8. Is program information issued by the Division of Social Services and other State and Federal agencies distributed to appropriate staff?
D. Complia	ance with Applicable Civil Rights Laws

Civil Rights Act of 1964, and the Americans with Disabilities Act?

Are program staff aware of requirements to comply with civil rights laws including

......(Dear Director Letter FAEP-14-2004, Civil Rights Assurances; Dear Director Letter PM-PC-03 NC Title VI County Compliance Officers Workshop dated 9/22/06)

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Yes N/A No	10. Is annual training provided to appropriate staff to review civil rights laws and expectations for providing benefits and services in a nondiscriminatory manner?
	(Dear Director Letter FAEP-14-2004, Civil Rights
	Assurances; FNS Certification Manual Section 120.02 B)  11. Are required civil rights posters prominently displayed in the lobby/reception area(s) of the agency?
	(FNS Certification Manual Section 120.02 C; Dear Director
	Letter PM-PC-03) 12. Are persons with Limited English Proficiency (LEP) provided the opportunity to obtain information from the agency both in person and by telephone?
	(Dear Director Letter PM-PC-02-2008)
	13. Does the agency have adequate staff and/or contracts in place to provide language interpretation to LEP customers when the need is identified?
	(Dear Director Letter PM-PC-02-2008)
	14. Does the agency have measures in place to communicate effectively with deaf or hard of hearing customers? (These may include sign language interpreters, access to a TTY machine or NC Relay telephone connectivity.)
	(Dear Director Letter PM-PC-02-2008)
	15. Does the agency have in place a Limited English Proficiency Plan?
	16. Does the agency have the required non-discrimination statement on each locally developed form intended for and used by customers?
	Documents are being revised to include the statement (Dear Director Letter PM-PC-01-
2007)	
II. HUMAN	RESOURCES
A. Control A	Activities / Information and Communication:
Yes N/A No	
	1. Are personnel policies in writing? (Can be agency, county or state)
	2. Are personnel files maintained for all employees?
	3. Are payroll costs accurately charged to federal and state grants using time spent in each program?
	4. Are accurate, up-to-date-position descriptions available?
	5. Do all supervisors and managers have at least a working knowledge of personnel policies and procedures?

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$\boxtimes \Box \Box$	

Yes N/A No	
7.	Does management ensure compliance with the agency's personnel policies and procedures manual concerning hiring, training, promoting, and compensating employees?
	8. Are the following duties generally performed by different people?  a. Processing personnel action forms and processing payrolls?  b. Supervising and timekeeping, payroll processing, disbursing, and making general ledger entries?  c. Personnel and:  1) Approving time reports?  2) Payroll preparation?  d. Recording the payroll in the general ledger and the payroll processing function?
$\boxtimes \Box \Box$	Comments: (8a-d)  9. Is access to payroll/personnel files limited to authorized individuals?
	10. Are procedures in place to ensure that all keys, equipment, credit cards, cell phones, pagers, etc. are returned by the terminating employee?
	Is information on employment applications verified and are references contacted?
III. ACCOU	NTS PAYABLE
A. Control A Yes N/A No	Activities / Information and Communication:
	1. Has the agency established procedures to ensure that all voided checks are properly accounted for and effectively canceled?
	2. Do invoice-processing procedures provide for: a. Obtaining copies of requisitions, purchase orders and receiving reports? b. Comparison of invoice quantities, prices, and terms with those indicated on the purchase order?
	<ul><li>c. Comparison of invoice quantities with those indicated on the receiving reports?</li><li>d. As appropriate, checking accuracy of calculations?</li><li>e. Alteration/mutilation of extra copies of invoices to prevent duplicate payments?</li><li>f. All file copies of invoices are stamped paid to prevent duplicate payments?</li></ul>
	Comments: (2a-f)
	4. Is the accounting and purchasing departments promptly notified of returned purchases, and are such purchases correlated with vendor credit memos?

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	<ul><li>a. All petty cash accounts?</li><li>b. All bank accounts? i.eTrust Accounts, GA accounts etc.</li></ul>
	Comments: (5a-b)
Yes N/A No	
$\boxtimes \Box \Box$	6. Are the following duties generally performed by different people? a. Requisitioning, purchasing, and receiving functions and the invoice processing, accounts payable, and general ledger functions?
$\square$	b. Purchasing, requisitioning and receiving?
	<ul><li>c. Invoice processing and making entries to the general ledger?</li><li>d. Preparation of cash disbursements, approval of them, and making entries to the general ledger?</li></ul>
$\square$	e. Making detail cash disbursement entries and entries to the general ledger?
	Comments: (6a-e)
	7. Is check signing limited to only authorized personnel?
	8. Are disbursements approved for payment only by properly designated officials?
	9. Is the individual responsible for approval or check signing furnished with invoices and supporting data to be reviewed prior to approval or check-signing?
$\boxtimes \Box \Box$	10. Are unused checks adequately controlled and safeguarded?
$\boxtimes \Box \Box$	11. Is it prohibited to sign blank checks in advance?
$\boxtimes \Box \Box$	12. Is it prohibited to make checks out to the order of "cash"?
	13. If facsimile signatures are used, are the signature plates adequately controlled and separated physically from blank checks?
$\boxtimes \Box \Box$	14. Are purchase orders prenumbered and issued in sequence?
	15. Are changes to contracts or purchase orders subject to the same controls and approvals as the original agreement?
	16. Are all records, checks and supporting documents retained according to the applicable (state or federal) record retention policy?

#### **COMPLIANCE SUPPLEMENT ELEMENTS** IV.

A/1: <u>ACTIVITIES ALLOWED OR UNALLOWED</u>
Each federal and State program has specific activities that are allowed or that may be unallowed. An example of a common unallowable activity under State or federal programs would be payments for

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lobbying activities designed to influence State or federal legislation. Activities allowed or unallowed from each funding source are identified in grant documents, allocation letters, contracts and State and federal legislation.

#### **Control Activities / Information and Communication:**

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	1. are allo	Before expenditures are made, does someone check that funds used for that service wable?
	2. Are	expenditure/ reimbursement reports reviewed to ensure adherence to funding limits?
All costs charadministration	rged to of the	COSTS/COST PRINCIPLES  State or federal funds must be reasonable and necessary for the operation and programs for which funding is received. Some funding sources limit the amount of administration.
Control Activ Yes N/A No	vities / I	nformation and Communication:
$\boxtimes \Box \Box$	1. federal	Does the agency have an approved indirect cost plan to allocate cost between programs or between federal and state programs?
$\boxtimes \Box \Box$	2.	Has the approved plan been submitted to the Controller's office?
	3. unauth	Are systems or other means established to prevent overpayments or payments to orized subrecipients or individuals?  Are contract payments reconciled to the general ledger monthly?
$\boxtimes \Box \Box$	5. request	Are payments to subrecipients required to be supported by a properly authorized for reimbursement or request for an advance from the subrecipient?
	6. with ap	Are expenditures to state or federal programs reviewed and approved by a person oproval authority?
	7. properly	Are personnel responsible for coding expenditures to state or federal programs ly trained to determine expenditures which are allowable and allocable to the federal ms?
	8. expend	Is the method of allocating cost understood by persons responsible for coding litures to state or federal programs?
	9. allowa	Are comparisons made between prior year allowable services and current year ble services?

### C/3: CASH MANAGEMENT

**Control Activities / Information and Communication:** 

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Yes N/A No	1.	Are requests for reimbursements (1571's) based on actual cash basis?
	2. or agre	Are reimbursements to subrecipients/contractors of agency compared to contracts ements periodically?
	3. the rela	Are reimbursements to sub recipients/contractors of the agency deferred until after ated expenditure is incurred?
	4.	Are the following duties generally performed by different people?
$\boxtimes \Box \Box$		a. Preparing the Request for Reimbursement (1571)?
$\boxtimes \Box \Box$		b. Reviewing and approving the Request for Reimbursement (1571)?
D: DAVIS-B	ACON.	ACT: This requirement is not applicable to DHHS subrecipients
E/5: ELIGIB		Information and Communication:
Yes N/A No	vicios ,	into matton and Communication.
	1.	Is there an up to date manual available to staff performing eligibility functions?
	2.	Are staff performing eligibility functions adequately trained?
	3. eligibil	Are client records periodically updated and reviewed to determine continued lity?
		AND REAL PROPERTY MANAGEMENT
	vities /	Information and Communication:
Yes N/A No	1. items,	Are fixed asset records maintained that adequately classify and identify individual as well as detailing their location?
	2.	If there are any missing assets, is a missing asset form completed?
	3.	Does the individual responsible for fixed assets perform the following: a. Attach fixed asset tags? b. Track when assets are received? c. Track when assets are donated? d. Track when asset location changes are made? e. Track when assets are sold? f. Track when assets are stolen or vandalized?

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	g. Track when assets are reassigned to a different organizational entity or to another
	agency? Comments: (3a-g)
	4. Are all disposals of property approved by a designated person with proper
	authority?

Rev 7/1/08 Yes <u>N/A</u> No		
	5. capital	Has agency management chosen and documented the threshold level for lization in an Internal Policy/Procedure Book?
	6.	Is someone assigned custodial responsibility by location for all assets?
	7.	Is access to the perpetual fixed asset records limited to authorized individuals?
	8.	Is there adequate physical security surrounding the fixed asset items?
	9.	Is there adequate insurance coverage of the fixed asset items?
	10.	Is insurance coverage independently reviewed periodically?
$\boxtimes \Box \Box$	11.	Is a fixed asset inventory taken annually?
$\boxtimes \Box \Box$	12.	Are missing items investigated and reasons for them documented?
G/7: <u>MATCI</u>	HING, I	LEVEL OF EFFORT, OR EARMARKING
Control Activ	vities / ]	Information and Communication:
	1.	Is appropriate action taken when matching or level of effort requirements are not
	2.	met as scheduled?  Are matching or level of effort requirements budgeted for state or federal financial nce programs?
	3.	Are "in-kind" contributions and volunteer services properly documented?
H/8 <u>: PERIO</u>	D OF A	VAILABILITY OF FEDERAL FUNDS
Control Activ	vities / l	Information and Communication:
Yes N/A No	1. funds	Does the accounting system prevent obligation or expenditure of State or Federal outside the availability period?
	2.	Is staff knowledgeable of grant cut-off dates?
	3.	Are unliquidated commitments cancelled at the end of the period of availability?

#### I/9: PROCUREMENT AND SUSPENSION AND DEBARMENT

Non-Federal entities are prohibited from contracting with or making subawards under covered transactions to parties that are suspended or debarred or whose principals are suspended or debarred. Covered transactions include procurement contracts for goods or services equal to or in excess of \$100,000 and all non-procurement transactions. <a href="http://www.epls.gov/">http://www.epls.gov/</a> This website is provided by General Services Administration (GSA) for the purpose of disseminating information on parties that are excluded from receiving Federal contracts, certain subcontracts, and certain Federal financial and nonfinancial assistance and benefits.

	rities / Information and Communication:
Yes N/A No	1. Is there established segregation of duties between employees responsible for contracting; accounts payable and cash disbursing?
$\boxtimes \Box \Box$	2. Is the contractor's performance including the terms, conditions, and specifications of the contract monitored and documented?
	3. Do supervisors review procurement and contracting decisions for compliance with State and Federal procurement policies?
	4. Are procedures established to verify that vendors providing goods and services under the award have not been suspended or debarred by the State or Federal Government?
	5. Are there written policies for the procurement and contracts establishing: a. contract files, b. methods of procurement, c. contractor rejection or selection, d. basis of contract price, e. verification of full and open competition, f. requirements for cost or price analysis, g. obtaining and reacting to suspension and debarment certifications, h. other applicable requirements for Federal procurement, i. conflict of interest.
Comm	nents: (5a-i.)
$\boxtimes \Box \Box$	6. Is there written policy addressing suspension and debarments of contractors?
	7. Is there a system in place to assure that procurement documentation is retained for the time period required by the A-102 Common Rule, OMB Circular A-110, award agreements, contracts, program regulations, and Social Services Record Retention
	schedule?
	8. Are there proper channels for communicating suspected procurement and
$\boxtimes \Box \Box$	ontracting improprieties?

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## J/10: PROGRAM INCOME

**Control Activities / Information and Communication:** 

Rev 7/1/08 <u>Yes N/A No</u>		
	1. Are collection policies and procedures clearly documented and communicated to personnel responsible for program income?	
	2. Are policies and procedures in place to ensure program income is deposited in the bank and reported as collected?	
	3. Are there policies and procedures to provide for the correct use of program income as directed by State or Federal program requirements?	
	4. Does the accounting system properly identify program income?	
	5. Are there proper channels for communicating suspected improprieties in the collection or use of program income?	
	6. Does management compare actual program income to budget and investigate differences?	
	L PROPERTY ACQUISITION AND RELOCATION ASSISTANCE: This requirement of apply to DHHS.	
and effective	RTING odic reporting subrecipients provide some assurance that funds are being managed efficiently y to accomplish the objectives for which the funds were provided. State and federal program call for a variety of financial, performance and special reporting.	
Control Acti Yes N/A No	vities / Information and Communication:	
	1. Are personnel responsible for submitting required reporting information adequately	
	trained?	
	a non-business day)	
$\boxtimes \Box \Box$	Spreadsheet'?  4. Are salaries paid at the approved rate in accordance with the county pay plan?	
	5. Are salaries for all county DSS employees reported on the DSS-1571?	

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		Certain off-site grant funded positions are not reported
$\boxtimes \Box \Box$	6.	Are fringe benefits claimed at the authorized rate?

Rev 7/1/08 <u>Yes N/A No</u>	
	7. Are Day sheets maintained by all staff having direct client contact when mandated and performing client-related activities in more than one program?
M/13: <u>SUBR</u>	ECIPIENT MONITORING
Federal and S subrecipient. funds as finar example, an a (CIP) paymen	State funds are subgranted by the agency, the agency has the responsibility, as required by tate regulations, to develop procedures to monitor that funds are appropriately spent by its The requirement to monitor applies only in instances where the subrecipient is granted the icial assistance, and does not apply to purchase of service contracts and agreements. For agreement where a subrecipient will determine eligibility for Crisis Intervention Program its must be monitored. An agreement where a contractor provides maintenance to computer not require monitoring, even if Federal or State funds will be used to support the contract.
Control Activ	vities / Information and Communication:
Yes N/A No	
	<ol> <li>Is a master list maintained of all contracts?</li></ol>
	terminated?
	4. Are findings identified in audit reports on subrecipients entered into a tracking system or otherwise identified for an audit resolution process?
	5. Are responses from subrecipients/Contractors indicating action to be taken on findings entered into a tracking system or otherwise identified for an audit resolution
$\boxtimes \Box \Box$	process?  6. Are audit findings identified in audit reports for subrecipients assigned to
$\boxtimes \Box \Box$	appropriate personnel to resolve the findings?
$\boxtimes \Box \Box$	findings have been resolved?
$\boxtimes \Box \Box$	9. Are monitors adequately trained to evaluate the programs administered by subrecipients/Contractors?
	10. Do monitors use a monitoring guide?

Do monitors consider factors such as size of grants, prior monitor findings,

compliance audit findings, the size of the organization receiving the grant, and the

11.

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	monito 12.	ence of the organization in administering the program in selecting subrecipients for ring visits?  Are monitor workpapers, findings, and resolutions reviewed by appropriately ated officials?
and are found program. For specify the cri	equirem in the la progran teria for	ents for Special Tests and Provisions are unique to each Federal and State program aws, regulations, and the provisions of contract or grant agreements pertaining to the as listed in the annual State Compliance Supplement, the compliance supplements respecial Tests and Provisions. Requirements that are in all programs are found in grequirements document.
Control Activ	rities / I	nformation and Communication:
	1.	Are compliance supplements reviewed annually by appropriate staff?
	2.	Are the crosscutting requirements reviewed annually by appropriate staff?

Rev 7/1/08	DAY SHEET TRAINING			
V. <u>Yes N/A</u> <u>No</u> □ □ □	1. The agency provided Day Sheet training for all appropriate staff during this past fiscal year.			
:	If yes, indicate the total number of staff trained595			
VI. Yes <u>N/A</u> <u>No</u>	SINGLE AUDIT			
$\boxtimes \Box \Box$	1. The agency was audited by an objective public accounting firm this past fiscal			
	year?			
	3. All audit findings and questioned costs from previous years have been appropriately resolved			
Responses of	TIONAL INFORMATION/ EXAMINATIONS OF AGENCY "No" in this section do not signify internal control weaknesses to be considered in ation of subrecipient.			
Yes N/A No				
	1. Has the agency undergone any other examination, monitoring, or investigation (either by an external entity or by internal audit staff) during the past year?  If yes, please indicate the name of the review.			
	<ul> <li>2. Has the agency undergone any reviews by the Division of Social Services in the past year?</li> <li>If so, please indicate the name of the review. See attached</li> </ul>			
	11 so, please indicate the name of the review. One attached			
VIII. CERTIFICATION  I hereby certify that the information presented in this self-assessment of internal controls and risk is true, accurate, and complete, to the best of my knowledge.				
Cumberland County Department of Social Services				
Agency Nam	ma / 10-14-01			
Signature, A	gency Director (REQUIRED)  Date			

### Number of staff who received Day Sheet Coding Training

STAFF DEVELOPMENT DAYSHEET CODING MEETINGS CHILD WELFARE	Randy White Kim Cribb Heather Skeens	15 13 160
ECONOMIC INDEPENDENCE	Richard Everett	167
		(Erwin provided training on the automated day
ADULT SERVICES	Jan Sosebee	240 sheets)
Total		595

# CUMBERLAND COUNTY DSS SFY 07-08 LIST OF PROGRAMS MONITORED

AREA	PROGRAM	NAME OF MONITOR
Adult Services	CARR (Quality Control)	Martha Waldrop
Adult Services	Cost of Living case review (February 08)	Carolyn McClananhan
Adult Services	E & T Monitoring (June 2008)	Kathy Evans
Adult Services	Employment & Training (Dec 2007)	Gale Bullard
Adult Services	Management Evaluation (M.E)	Lula Crenshaw
Adult Services	Medicaid Quality Control (periodic throughout the year)	Vickie Turlington
Adult Services	Monthly Food Stamp Quality Control	Maggie Reece (State office)
Adult Services/CARE Center	Domestic Violence Grant/Governor's Crime Commission	Elaine Smokes
Adult Services/CARE Center	Marriage License Grant/NC Council for Women	Diane Castello
Adult Services/CARE Center	Work First Monitoring	Barbara Strickland
Child Welfare	IV-E Foster Care & Adoption Assistance	Gloria Duncan
Economic Independence	Day Care	Dora McCallum
Economic Independence	Work First Monitoring	Barbara Strickland
Economic Independence	E & T Monitoring (June 2008)	Kathy Evans
Economic Independence	BEER & FRR REPORTS	Elizabeth O'Dell
Economic Independence	Food Stamps	Gayle Bullard
Economic Independence	Food Stamps (Mgmt Eval Review)	Gerald Hinson
Economic Independence	Medicaid	Elizabeth O'Dell
Economic Independence	Work First	Diane Chavis
Economic Independence	New Hire National Data	Diane Chavis